

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ALABAMA
NORTHERN DIVISION**

IN RE:)	
Keith E. Campbell)	CHAPTER 13
)	CASE NO. 12-83621-CRJ-13
SSN: XXX-XX-8242)	
)	
DEBTOR)	

TRUSTEE'S MOTION TO MODIFY

COMES NOW, Michele T. Hatcher, the Standing Chapter 13 Trustee, in the above styled case, and moves this Court to modify the Debtor's Plan confirmed January 23, 2013. As grounds for this Motion the Trustee states:

1. The base gross due under the confirmed Plan must be increased by \$375, for a total amount due of \$33,217, to pay in full the secured claims as filed. In order to increase the base gross, the payments resume at \$277 bi-weekly beginning August 2017.

WHEREFORE, The Trustee moves this Court to increase the Base Gross due under the Plan by \$375, for a total amount of \$33,217, in order to pay the secured claims in full.

/s/ Michele T. Hatcher
Michele T. Hatcher
Standing Chapter 13 Trustee
P.O. Box 2388
Decatur, AL 35602
(256) 350-0442

NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE U.S. BANKRUPTCY COURT AND A COPY SERVED ON THE CHAPTER 13 STANDING TRUSTEE WITHIN TWENTY ONE (21) DAYS FROM DATE OF SERVICE HEREOF. THIS MOTION WILL BE GRANTED UNLESS AN OBJECTION IS FILED WITHIN TWENTY-ONE (21) DAYS

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2017, I have served a copy or the foregoing on the parties listed below by depositing the same in the United States Mail, postage prepaid and properly addressed, or if the party being served is a registered participant in the CM/ECF System for the United States Bankruptcy Court for the Northern District of Alabama, service has been made by a "Notice of Electronic Filing" pursuant to FRBP 9036 in accordance with subparagraph II.B.4 of the Court's Administrative Procedures.

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